

DAVIDSON LAW GROUP, ALC
Ben M. Davidson (CASB #181464)
ben@dlgla.com
4500 Park Granada Blvd, Suite 202
Calabasas, California 91302
Office: (818) 918-4622
Fax: (310) 473-2941

ERGONIQ LLC
David W. Long (admitted *pro hac vice*)
longdw@ergoniq.com
8200 Greensboro Dr., Suite 900
McLean, VA 22102
Office: (202) 847-6853

Attorneys for Plaintiff DMF, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

DMF, Inc.,

Plaintiff,

v.

AMP Plus, Inc., d/b/a ELCO
Lighting, and d/b/a ELCO Lighting
Inc.,

Defendant.

Case No. 2:18-CV-07090 CAS
(GJSx)

**Stipulation To Dismiss Without
Prejudice Trademark and Unfair
Competition Claims**

Pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, Plaintiff DMF, Inc. (“Plaintiff”) and Defendant AMP, Plus, Inc. dba ELCO Lighting and ELCO Lighting Inc. (“ELCO”), stipulate as follows:

DMF’s Complaint filed on August 15, 2018 states a cause of action for patent infringement (Count I) and three causes of action for trademark infringement and unfair competition (Counts II, III, and IV—misnumbered as Counts II, II, and V). DMF’s trademark and unfair competition claims were based in part on ELCO’s use

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1 of the trademark UNO to advertise products that ELCO has rebranded using other
2 marks or has discontinued selling. The parties therefore agree to dismissal without
3 prejudice of DMF's federal and state trademark and unfair competition claims
4 (Counts II, III, and IV) pursuant to the concurrently-filed proposed order.
5

6 Respectfully submitted,
7

8 Dated: May 20, 2021

9 By: /s/ Ben M. Davidson
10 DAVIDSON LAW GROUP, ALC
11 Ben M. Davidson (State Bar No. 181464)
12 ben@dlgla.com
13 4500 Park Granada Blvd, Suite 202
14 Calabasas, California 91302
15 Office: (818) 918-4622
16 Fax: (310) 473-2941

Attorneys for Plaintiff DMF, Inc.

17 And

18 By: /s/ Roger Scott (with permission)

19 BUCHALTER
20 A Professional Corporation
21 J. Rick Taché
22 Kari L. Barnes
23 Roger L. Scott

24 Attorneys for Defendants
25 AMP Plus, Inc. doing business as ELCO
26 Lighting and ELCO Lighting, Inc.
27

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CERTIFICATION PURSUANT TO LOCAL RULE 5-4.3.4(a)(2)(i)

Pursuant Central District of California Local Rule 5-4.3.4(a)(2)(i), I hereby certify that the content of this document is acceptable to Mr. Roger Scott, counsel for ELCO, and I have obtained his authorization to affix his electronic signature to this document.

May 20, 2021

By: /s/ Ben M. Davidson
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